

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA and
THE COMMONWEALTH OF
MASSACHUSETTS *ex rel.*
STEPHEN M. ZAPPALA, M.D.,
OLIVIA LANNA, M.D., and ERIC WOJCIK,

Plaintiffs,

v.

STEWARD HEALTH CARE SYSTEMS, LLC,
et al.,

Defendants.

FILED UNDER SEAL

No. 18-cv-12125-ADB

**NOTICE OF INTERVENTION IN PART
FOR SETTLEMENT PURPOSES AND DECLINATION IN PART**

Pursuant to 31 U.S.C. § 3730(b)(2) and (4), and Mass. Gen. Laws ch. 12, § 5C(4), the United States and Commonwealth of Massachusetts (“Commonwealth”) notify the Court of their respective decisions to intervene in part of this action solely for the purposes of settlement with Steward Health Care System LLC, Steward Medical Group, Inc., Steward Health Care Network, Inc., Steward Good Samaritan Medical Center, Inc., Steward St. Elizabeth’s Medical Center of Boston, Inc., Steward St. Anne’s Hospital Corporation, Steward Norwood Hospital, Inc., Steward Holy Family Hospital, Inc., Steward Carney Hospital, Inc., Nashoba Valley Medical Center, A Steward Family Hospital, Inc., and Morton Hospital, A Steward Family Hospital, Inc. (collectively, “Steward”). The United States and the Commonwealth have reached a settlement with Steward and intervene with respect to claims the relators asserted against Steward on behalf of the United States and the Commonwealth for the Covered Conduct, as defined in Paragraphs G(a) and (b) of the April 25, 2022 settlement agreement among the United States; the

Commonwealth of Massachusetts; Steward; Stephen M. Zappala, M.D., Olivia Lanna, M.D., and Eric Wojcik (“Relators”); and Quincy Medical Center, A Steward Family Hospital, Inc., New England Sinai Hospital, A Steward Family Hospital, Inc., Steward Good Samaritan Radiation Oncology Center, Inc., Steward Sebastian River Medical Center, Inc., Steward Rockledge Hospital, Inc., Steward Melbourne Hospital, Inc., Steward Trumbull Memorial Hospital, Inc., Steward Sharon Regional Health System, Inc., Steward Easton Hospital, Inc., Steward Integrated Care Network, Inc., Steward National Care Network, Inc., and Steward Medicaid Care Network, Inc. (collectively, “Additional Steward Entities”) (“Settlement Agreement”).

After Steward satisfies its payment obligation under the Settlement Agreement, the United States, the Commonwealth, and the relators will file a joint stipulation of dismissal pursuant to the Settlement Agreement’s terms.

The United States and the Commonwealth decline to intervene with respect to the relators’ allegations concerning all other claims in the relators’ Complaint.

Dated: April 27, 2022

Respectfully submitted,

MAURA HEALEY
Attorney General

RACHAEL S. ROLLINS
United States Attorney

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CERTIFICATE OF SERVICE

I certify that the foregoing notice was served on the following counsel by e-mail on the date below.

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Dated: April 27, 2022

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